

June 13, 2023

Honorable Christine P. O'Hearn
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Room 1050
Camden, NJ 08101

RE: REQUEST FOR LEAVE TO FILE SUR REPLY to ECF 33 AND MOTION FOR SANCTIONS PURSUANT TO FRCP R. 11.

In Re: McBride and Blissick v. NJ Pen Media Group 1:23-cv-02044

Dear Judge O'Hearn,

The undersigned is the co-Plaintiff proceeding pro se. **We, the Plaintiffs, request to file a brief sur reply and motion for sanctions pursuant to FRCP Rule 11 as to ECF 31.**

Plaintiffs take seriously our appearance before the Court. We find it peculiar that opposing counsel would expect the court to "finger wag" at our use of litigation privilege to characterize Defendants' actions as racist and misogynist internet troll. Defendant's counsel claims Defendant has "first amendment rights" but then expects this Court to trample over the Plaintiffs' rights to characterize their opinion of Defendant in words. At the same time Defendant and his counsel fume at our use of litigation privilege, they take opportunity to lie to Your Honor in ECF 33.

Defendant by and through counsel denies the fact that articles about the Plaintiffs are free to view but other articles are not. Counsel's representation to the court is patently untrue. Plaintiffs printed off the articles about the Plaintiffs without a paid subscription. However, as is attached here, the most recent police stories require a subscription. Stories of national significance, like the criminal prosecution of actor Gary Busey require a subscription. Plaintiffs, if granted leave to file a sur reply, would like to present each and every "locked" article on NJPen.com to establish that Plaintiffs are treated differently. Just because counsel says it did not happen does not make it so.

Plaintiffs are left to scratch their head as to why opposing counsel would make such a stink over our calling his client an internet troll when they actually made materially false statements to this Court.

If the Defendant's counsel would like us to file a brand new court action for a tortious interference claim as opposed to amending the complaint at the case at bar, I would really like to know the answer to that question. Unfortunately, they refuse to communicate outside of court filings, even email.

Very truly yours,

Brian McBride
Co-Plaintiff Pro Se
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